

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i> ¹ ,)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	Hearing Date: April 23-25, 2007 @ 9:00 am
)	Pittsburgh, PA
)	
)	Re: Docket Nos. 15156 and 15189

**ANDERSON MEMORIAL HOSPITAL AND
ANDERSON CLAIMANTS' OBJECTIONS TO DEBTORS' EXHIBITS**

General Objections and Reservation of Rights:

1. Claimants reserve the right to require the Debtors' to lay a proper foundation for the admission of any evidence and reserve the right to object to any exhibit should a proper foundation not be laid.
2. Claimants reserve the right to object to any exhibits that purport to be summaries or exemplars and reserve the right to conduct *voir dire* examination of any witness who purports to rely on or introduce a summary or exemplar exhibit.

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp, Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B 11 Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

3. Claimants object to the grouping of unrelated documents into a single exhibit.

Specific Objections to Exhibits:

- Exhibit 2 Objection:
Hearsay to the extent the exhibit is offered to prove the truth of the matter asserted therein.²
- Exhibit 3 Objection:
Hearsay to the extent the exhibit is offered to prove the truth of the matter asserted therein.
- Exhibit 4 Objection:
Hearsay to the extent the exhibit is offered to prove the truth of the matter asserted therein.
- Exhibit 5 Objection:
Relevance: this chart lists at least three claims which are not scheduled for Product ID litigation pursuant to Exhibit A of the the Court's October 13, 2006 Scheduling Order;³
Hearsay to the extent the exhibit is offered to prove the truth of the matter asserted therein.
Incomplete: The factual information reprinted in this chart is incomplete and excludes other data, which in fairness, should be included in the exhibit.⁴
- Exhibit 6 Objection.
Relevance: this chart lists at least three claims which are not scheduled for Product ID litigation pursuant to Exhibit A of the the Court's October 13, 2006 Scheduling Order;
Hearsay to the extent the exhibit is offered to prove the truth of the matter asserted therein.
Incomplete: The factual information reprinted in this chart is incomplete and excludes other data, which in fairness, should be included in the exhibit.
- Exhibit 8 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

² All objections of hearsay are based upon Rule 802, FRE.

³ All objections to relevance are based upon Rule 402, FRE.

⁴ All objections to the incompleteness of a document are based upon Rule 106 and Rule 1002, FRE.

- Exhibit 9 Objection:
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms.
- Exhibit 10 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
- Exhibit 11 Objection.
Relevance: This exhibit contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
- Exhibit 12 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
Incomplete: This exhibit contains one page from a four-page stand-alone document with attachments, which, if relevant, should be fully included in the exhibit.
- Exhibit 13 Objection:
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms.

- Exhibit 14 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 15 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 16 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms.
- Exhibit 17 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 18 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 19 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 20 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 21 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.

- Exhibit 22 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms.
- Exhibit 23 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 24 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
- Exhibit 25 **Hearsay:** this exhibit contains reference to sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms. To the extent the sampling reports are admissible as evidence, the sample listed in the summary page is not included in the exhibit.
- Exhibit 26 **Hearsay:** this exhibit contains reference to sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms. To the extent the sampling reports are admissible as evidence, the sample listed in the summary page is not included in the exhibit.
- Exhibit 27 **Hearsay:** this exhibit contains reference to sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
Incomplete: To the extent the sampling reports are admissible as evidence, the sample listed in the summary page is not included in the exhibit.

- Exhibit 28 **Hearsay:** this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Incomplete: This exhibit contains a one-page attachment from the claim form, if relevant, should include all amendments and supplements to the claim for as well.
- Exhibit 29 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms.
- Exhibit 30 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
- Exhibit 31 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.
- Exhibit 32 Objection.
Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.
Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Exhibit 33

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Incomplete: This exhibit contains a one-page attachment from the claim form, if relevant, should include all amendments and supplements to the claim for as well.

Exhibit 34

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Illegible.

Exhibit 35

Objection.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Illegible.

Exhibit 36

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Incomplete: This exhibit contains a one-page attachment from the claim form, if relevant, should include all amendments and supplements to the claim for as well.

Exhibit 37

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Incomplete: This exhibit contains a one-page attachment from the claim form, if relevant, should include all amendments and supplements to the claim for as well.

Exhibit 38

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Exhibit 39

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Exhibit 40

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Exhibit 41

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order. This exhibit further contains stand-alone documents, which are unrelated to the issue of Product Identification, or the other documents contained in this exhibit.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

Incomplete: the lone signature page of the Claimant's original claim form is incomplete and does not include the signature pages from amended claim forms.

Exhibit 42

Objection.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

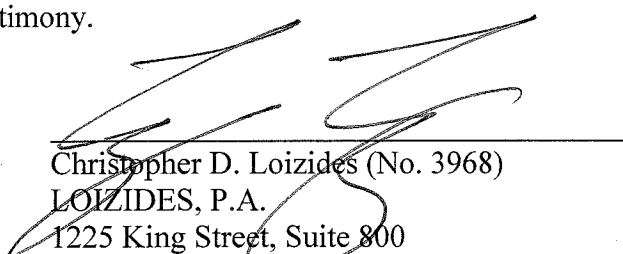
Exhibit 43

Objection.

Relevance: this exhibit refers to claim information for a claim that is not scheduled for Product ID litigation pursuant to Exhibit A of the Court's October 13, 2006 Scheduling Order.

Hearsay: this exhibit contains sampling reports which are not admissible as stand alone evidence of the matters contained in the report in the absence of expert testimony.

DATED: April 17, 2007



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